

**RECEIVED**

JAN 14 2019

~~CLERK, U.S. DISTRICT COURT~~  
ST. PAUL, MINNESOTA

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

Patrizia Davis

Plaintiff(s),

vs.

Quality Inn  
Somerset Hospitality LLC.

Case No. 19 cv 97 SRN/DTS  
(To be assigned by Clerk of District Court)

DEMAND FOR JURY TRIAL

YES  NO

Defendant(s).

(Enter the full name(s) of ALL defendants in  
this lawsuit. Please attach additional sheets  
if necessary).

COMPLAINT

PARTIES

1. List your name, address and telephone number. Do the same for any additional plaintiffs.

a. Plaintiff

Name Patrizia Davis

Street Address 305 8th St. Apt #3

County, City Dakota Co. Farmington

State & Zip Code Minnesota 55024

Telephone Number 903-399-6995

SCANNED

JAN 14 2019

PCW

U.S. DISTRICT COURT ST. PAUL

2. List all defendants. You should state the full name of the defendant, even if that defendant is a government agency, an organization, a corporation, or an individual. Include the address where each defendant may be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption.

a. Defendant No. 1

Name SALMAN Rizvi/OWNER.

Street Address 4601 HWY 13W.

County, City Scott SAVAGE

State & Zip Code Minnesota 55378

b. Defendant No. 2

Name Sabreena Rizvi/owner.

Street Address 4601 HWY 13 W.

County, City Scott, SAVAGE

State & Zip Code Minnesota 55378

c. Defendant No. 3

Name NATALIA BORZENKO/General Manager,

Street Address 4601 HWY 13 W.

County, City Scott SAVAGE

State & Zip Code Minnesota 55378

NOTE: IF THERE ARE ADDITIONAL PLAINTIFFS OR DEFENDANTS, PLEASE PROVIDE THEIR NAMES AND ADDRESSES ON A SEPARATE SHEET OF PAPER.

Check here if additional sheets of paper are attached:

Please label the attached sheets of paper to correspond to the appropriate numbered paragraph above (e.g. Additional Defendants 2.d., 2.e., etc.)

## JURISDICTION

Federal courts are courts of limited jurisdiction. Generally, two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case involving the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one state sues a citizen of another state and the amount of damages is more than \$75,000 is a diversity of citizenship case.

3. What is the basis for federal court jurisdiction? (*check all that apply*)

Federal Question       Diversity of Citizenship

4. If the basis for jurisdiction is Federal Question, which Federal Constitutional, statutory or treaty right is at issue? List all that apply. *28 USC §1331*

5. If the basis for jurisdiction is Diversity of Citizenship, what is the state of citizenship of each party? Each Plaintiff must be diverse from each Defendant for diversity jurisdiction.

Plaintiff Name: \_\_\_\_\_ State of Citizenship: \_\_\_\_\_

Defendant No. 1: \_\_\_\_\_ State of Citizenship: \_\_\_\_\_

Defendant No. 2: \_\_\_\_\_ State of Citizenship: \_\_\_\_\_

Attach additional sheets of paper as necessary and label this information as paragraph 5.

Check here if additional sheets of paper are attached.

6. What is the basis for venue in the District of Minnesota? (*check all that apply*)

Defendant(s) reside in Minnesota  Facts alleged below primarily occurred in Minnesota  
 Other: explain

## STATEMENT OF THE CLAIM

Describe in the space provided below the basic facts of your claim. The description of facts should include a specific explanation of how, where, and when each of the defendants named in the caption violated the law, and how you were harmed. Each paragraph must be numbered

separately, beginning with number 7. Please write each single set of circumstances in a separately numbered paragraph.

7. see  
ATTACHED

Attach additional sheets of paper as necessary.

Check here if additional sheets of paper are attached:

Please label the attached sheets of paper to as Additional Facts and continue to number the paragraphs consecutively.

**REQUEST FOR RELIEF**

State what you want the Court to do for you and the amount of monetary compensation, if any, you are seeking. **\$350,000.00 DOLLARS**

Defendant's did not answer  
any demands and refused to  
answer to comply with  
Plaintiff Request of ANY  
information pertaining to  
the slip and fall.

I was staying at the Quality Inn of Savage My name is Patrizia Davis on January 16, 2017 between 7:15 pm – 7:30pm I was headed to my car to retrieve my school books.

I walked through the lobby and past the first door then the second door that leads outside to parking lot. As I walked past the pool to the edge of walk way I unlocked my car and I never made it to my car I slipped on the ice and hit a beam cover with ice.

No one asked me I needed medical attention or not, the next day I went to emergency and they took x-rays and said for me to see my primary Doctor. The urgent care gave me papers for hotel to fill out they took my papers and Discarded them I never seen them again.

I was advised by my Dr that I had a torn rotator cuff need surgery ASAP.

I have not been contacted by the hotel owner or staff I have been avoided since this slip and fall occurred.



Patrizia Davis

12-15-18

Signed this 15<sup>th</sup> day of December 2018

Signature of Plaintiff



Mailing Address

305 87th ST. APT 3  
FARMINGTON, MN. 55024

Telephone Number

(903) 399-6995

Note: All plaintiffs named in the caption of the complaint must date and sign the complaint and provide his/her mailing address and telephone number. Attach additional sheets of paper as necessary.